

Region 2 Enforcement & Compliance Assurance Division Air Compliance Branch

CAA Inspection Report

Inspection Date: 2/25/2021

Facility Name: Buckeye Port Reading Terminal LLC

Facility Address: 750 Cliff Road, Port Reading, NJ 07064

ICIS-Air ID #: NJ0000003402300053

Facility Contact: Mike Boylan, Assistant Operations Manager-732-692-5295-mboylan@buckeye.com

EPA Lead Inspector: Mozafar Ghaffari, Environmental Engineer 212-637-3925

EPA Asst. Inspector: Victor TU, Environmental Engineer 212-637-3477

State Inspector(s): Aisha Alvi, NJDEP Inspector- Cell # 732-575-4258

Other Inspector(s): Other inspector name, title, phone number.

Other Attendees: Frances Lindsley-Matthews, Sr. Specialist Air Compliance-Cell # 732-535-4258

EPA Opening Meeting

EPA Inspectors Mr. Mozafar (Mozey) Ghaffari and Mr. Victor Tu arrived at the facility at approximately 9:00AM and met with NJDEP inspector Ms. Aisha Alvi. The weather condition was sunny, and temperature was 45°F. Upon arrival at the facility, we observed no visible emissions from the facility. After we parked our cars at a parking lot next to the office building, Mr. Ghaffari called Mr. Boylan, Assistant Operations Manager to come to the parking lot for an opening meeting. During the opening meeting, Mr. Ghaffari explained that the purpose of EPA's inspection was to tour the facility and use a forward looking infrared (FLIR) camera for surveying of the gasoline storage tanks for any excess emissions, followed by a closing meeting. Mr. Ghaffari began the opening meeting by requesting an overview of the historic and current operations at the facility. Ms. Lindsley-Matthews provide the following facility description to Mr. Ghaffari prior to the EPA inspection:

The Port Reading Facility is a bulk petroleum storage and transfer facility located in Middlesex County New Jersey. The Port Reading facility is located at 750 Cliff Road in the town of Port Reading, New Jersey, on the west bank of the Arthur Kill, adjacent to the Conrail Port Reading Yard.

The facility was historically operated as a refinery and petroleum storage terminal. All the refinery process units have been dismantled and removed when it was permanently shut down in February 2013. The entire facility occupies approximately 247 acres of land. The facility is bordered to the north by a Conrail railroad yard, on the south by the Public Service Electric and Gas (PSE&G) Sewaren Generating Station, to the east by the Arthur Kill and to the west the town of Sewaren, New Jersey.

Principal facility components include:

- Aboveground storage tanks with External Floating Roofs (EFR) and Internal Floating Roofs (IFR) with covers storing gasoline, gasoline blends, diesel, ethanol and trans mix products;
- Truck loading racks equipped with a Vapor Recovery Unit (VRU) and Total Hydrocarbon (THC) analyzer;
- Marine Docks equipped with Vapor Recovery Units (VRUs) and THC analyzers;
- Butane rail offloading, storage and blending;
- Butane rail offload, via mobile loaders to truck.

The facility is regulated as an area source of HAPs under a Title V air permit approved by NJDEP. Emission units (EUs) in gasoline services are subject to the regulation under 40CFR Part 63 Subpart BBBBBB.

Summary of Observations

Around 10:00 AM, EPA and NJDEP Inspectors toured the Terminal with Mr. Boylan and Ms. Lindsley-Matthews. Each inspector used their own cars to follow Mr. Boylan to survey gasoline and ethanol storage tanks. Mr. Tu carried the FLIR camera to survey the storage tanks for any emissions. Twenty-five tanks were monitored and five tanks had some minor leaks from the roof vents.

Tank #	Product	Recorder emissions
1201	Gasoline	Video 65 -breathing losses
1203	Gasoline	
1231	Ethanol	
1232	Gasoline	
1233	Gasoline	
1229	Ethanol	
1205	Gasoline	
1208	Gasoline	Video 66 -breathing losses
1206	Gasoline	
1207	Gasoline	Video 67 - breathing losses
1215	Gasoline	
1216	Gasoline	Video 68 - breathing losses
7945	Gasoline	Video 69 - breathing losses
1220	Gasoline	
7943	Gasoline	
7944	Gasoline	
7937	Gasoline	
7934	Gasoline	
7938	Gasoline	
7935	Gasoline	
7940	Gasoline	
1221	Gasoline	
1222	Gasoline	
1223	Gasoline	
1217	Gasoline	

At approximately 12:00 PM, the inspectors went to Truck loading rack with Mr. Boylan and Ms. Lindsley-Matthew. Mr. Tu used its IR camera and surveyed the truck loading rack and Vapor Recover Unit. A leak was

identified at the vapor recovery line. Facility representatives were able to make appropriate repairs to stop the leak prior to the inspectors' departure from the facility.

Records Review

Prior to the EPA inspection, Mr. Ghaffari requested Ms. Lindsley-Matthews to provide the following records for the EPA review:

- Complete Buckeye Port Reading Title V permit;
- October 29, 2014 Notification of Compliance Status Report for 40 CFR 63 Subpart BBBBBB;
- October 2014 Monitor Monitoring and Inspection Plan;
- The 9/2020 Monthly Inspection Report including the method of leak detection (i.e., sight, sound or smell) as required by MACT Subpart BBBBBB;
- 2020 visual tank inspection reports for Tanks 1207, 1208 and 1216 to comply with the NJDEP tank regulation (including LEL monitoring).

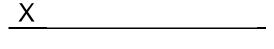
Closing Meeting

EPA and NJDEP inspectors ended their inspection around 12:30pm and Mr. Ghaffari had a closing meeting at Truck Loading Rack parking lot. Mr. Ghaffari informed Buckeye personal that of the 25 tanks EPA monitored, 5 were found to have some minor leaks from their vents. The minor leaks should be further investigated by the facility to ensure that they not something other than just breathing losses. EPA concluded its inspection around 12:35 PM and then left the facility.

Lead Inspector's Name:	Mozafar Ghaffari,	Environmental	Engineer	212-637-39) 25

Lead Inspector

Assisting Inspector's Name: Victor TU, Environmental Engineer 212-637-3477



Assisting Inspector

Supervisor's Name: Geatano LaVigna

Χ			

3

Supervisor